

The Honorable Robert S. Lasnik

UNITED STATES DISTRICT COURT FOR THE
WESTERN DISTRICT OF WASHINGTON
AT SEATTLE

UNITED STATES OF AMERICA,

Plaintiff,

v.

BRYAN MICHAEL POLLESTAD,

Defendant.

NO. CR20-00088 RSL

PROTECTIVE ORDER FOR
CERTAIN DISCOVERY ITEMS

This matter, having come to the Court's attention on the Stipulated Motion for a Protective Order Regarding Certain Discovery Items submitted by the United States of America, and the Court, having considered the motion, and being fully advised in this matter, hereby enters the following PROTECTIVE ORDER:

1. The defense team¹ will not make copies of any kind of any part of the designated "protected" items without prior written permission of the government, except that the materials may be downloaded from USAfx and placed on a server or other appropriate storage medium under the secure control of the defense team.

¹ As used herein, the "defense team" includes counsels of record, their employees (such as any associate counsel, paralegals, legal assistants, and interns), and their contractors (such as investigators and experts).

1 2. The defense teams will not share any of the material designated as
2 protected with anyone except for the Defendant and others who are part of the same
3 defense team without prior written permission of the government.

4 3. The defense team may review all of the discovery, including protected
5 material, with the Defendant. The defense team may not, however, leave any protected
6 material in the possession of the Defendant or permit it to be copied.

7 4. If the defense team wishes to file any protected material with the Court, or
8 to make reference to its contents, including reference to the identity of a confidential
9 source, the filing must be sealed, absent prior written permission of the government to
10 file an unsealed version.

11 5. The provisions of the protective order shall apply to all members of the
12 defense team, including but not limited to other attorneys, contract attorneys,
13 investigators, legal assistants, interns, experts, and paralegals. It is the responsibility of
14 defense counsel to ensure that all members of the defense team understand the
15 restrictions of the protective order and understand that they are required to abide by those
16 restrictions.

17 6. In the event that current defense counsel is replaced by new defense
18 counsel, defense counsel shall not turn over any discovery to new counsel without prior
19 written permission of the government. The government will only grant permission when
20 it is satisfied that new counsel has reviewed the terms of the Protective Order and has
21 acknowledged that he/she is bound by them.

22 7. The provisions of this Order shall not terminate at the conclusion of this
23 prosecution.

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Mr S Casnik

Robert S. Lasnik
United States District Judge